

Michael Steinmetz, Esq.  
Garson, Ségal, Steinmetz, Fladgate LLP  
164 West 25<sup>th</sup> Street, Suite 11 R  
New York, NY 10001  
Phone: (212) 380-3623  
Fax: (347) 537-4540  
[ms@gs2law.com](mailto:ms@gs2law.com)

*Pro Hac Vice* application filed for:  
Robert Garson, Esq.  
GS2Law PLLC  
20801 Biscayne Blvd, Ste 506  
Miami, FL 33180  
Phone: (305) 780-5212  
[rg@gs2law.com](mailto:rg@gs2law.com)

Attorneys for Matthew Taibbi

**UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY  
NEWARK DIVISION**

MATTHEW TAIBBI,

Plaintiff,

Civil Action No.: 2:25-cv-02275-EP-LDW

v.

SYDNEY KAMLAGER-DOVE,

Defendant.

\_\_\_\_\_x

**APPLICATION FOR ADMISSION *PRO HAC VICE***

Michael Steinmetz, a member in good standing of the Bar of the State of New Jersey and admitted to practice before the United States District Court for the District of New Jersey and a partner with the law firm of Garson, Ségal, Steinmetz, Fladgate LLP, hereby

applies to the Court for an Order permitting Robert Garson of the law firm GS2Law PLLC to practice pro hac vice before the United States District Court for the District of New Jersey on behalf of Matthew Taibbi, party in interest in these proceedings pursuant to R.101.1(c). In support of this application, the undersigned shall rely upon the certifications of Michael Steinmetz, Esquire and Robert Garson, Esquire. A proposed form of Order is also being submitted.

Respectfully Submitted,

**Garson, Ségal, Steinmetz, Fladgate LLP**

Dated: April 3, 2025

By: /s/ Michael Steinmetz  
Michael Steinmetz (MS-3164)  
Garson, Ségal, Steinmetz, Fladgate  
LLP  
164 West 25<sup>th</sup> Street, Suite 11 R  
New York, NY 10001  
Phone: (212) 380-3623  
Fax: (347) 537-4540